BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL HATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS TO UNITED PARCEL SERVICE WITNESS NEELS (USPS/UPS-T1—52)

Pursuant to rules 25 through 27 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatory and request for production of documents to United Parcel Service witness Neels: USPS/UPS-T1—52.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 June 28, 2000

USPS/UPS-T1-52. Please refer to your response to USPS/UPS-T1-33(d).

Please provide equations for the "correct 'non-reverse' regressions... implicitly defined by the regression models on page 35, lines 3 and 7" of UPS-T-1. Please also describe your derivation of the equations you provide.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Susan M. Duchek

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